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February 25, 2011

VIA ECF

Hon. Douglas E. Arpert,
U.S. Magistrate Judge
Clarkson S. Fisher U.S. Courthouse
402 E. State Street
Trenton, New Jersey 08608

Re: Charles Novins, Esq., P.C. et al. v. Kevin A. Cannon, et al.
U.S. District Court of NJ - Trenton
Civil Action: **09-CV-5354-AET-DEA**

Dear Judge Arpert:

I write pursuant to *L. Civ. R. 72.1(c)(1)(B)* to request that Your Honor stay all fact discovery in this matter as to Defendant and Counterclaim Richard Vince Lamb pending the outcome of my motion to reconsider paragraph two (2) of Your Honor's February 10, 2011 Scheduling Order (docket item no. **69**) directing that fact discovery as to and between the existing parties must be concluded by March 25, 2011. The reason for this request is that allowing fact discovery upon Dr. Lamb will impose a hardship that will be avoided if paragraph two (2) of the scheduling order is reversed by Your Honor.

Respectfully Submitted,

/s/ Dennis J. Duncan

Dennis J. Duncan

cc: Charles Novins, Esq. (*via ECF*)
Joseph Manzo, Esq. (*via ECF*)